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November 2, 2018

VIA ECF

Honorable Naomi R. Buchwald
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Plaintiff: Michelle Clark
Insured: Target Corporation
Date of Loss: 1/05/2018
Claim Number: 000298756G-0001
Our File Number: TARG-545
Docket No.: 18-cv-05865

Dear Honorable Judge Buchwald:

Our firm represents the defendants Target Corporation in the above referenced matter. This is a joint letter submitted with the consent of plaintiff's counsel. This letter is in accordance with a directive by the Court to file a joint letter on the status of discovery.

Plaintiff's deposition was conducted on October 18, 2018. Plaintiff served her responses to interrogatories on October 23, 2018 and received on October 31, 2018. Defendant's deposition was scheduled to be held on October 25, 2018, however, due to a pre-planned business trip this deposition was adjourned to November 30, 2018. The plaintiff also just served her demand for interrogatories received on October 31, 2018. Therefore, we will require until year end to complete fact discovery.

Upon completion of fact discovery, and prior to conducting medical expert exchanges and depositions, we'd request a conference to discuss settlement.

Respectfully submitted,

MOLOD SPITZ & DeSANTIS, P.C.

By:


Alice Spitz

AS:

Cc: John G. Papadopoulos, Esq.